

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 07-173-SLR
)	
WILLIAM VANOVER,)	
)	
Defendant.)	

**GOVERNMENT’S MOTION FOR A CHANGE OF PLEA HEARING
AND TO EXCLUDE TIME**

NOW COMES the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Shawn A. Weede, Assistant United States Attorney for the District of Delaware, and hereby submits the following:

1. The defendant was arrested on September 21, 2007.
2. The defendant is currently on pre-trial release.
3. Counsel for the defendant, Gordon L. McLaughlin, Esquire, has advised the government that his client wishes to waive Indictment, proceed by felony Information, and enter into the government’s proposed Memorandum of Plea Agreement.
4. On December 20, 2007, the government filed a felony Information, charging the defendant with one count of violating 18 U.S.C. § 922(g)(1).
5. The government requests that the Court schedule a hearing where the defendant may waive Indictment and change his plea.
6. A copy of the proposed Memorandum of Plea Agreement will be forwarded to the Court under separate cover.
7. The government further requests that the Court exclude the time from the date

of this motion until the date it sets for the above hearing under the Speedy Trial Act (18 U.S.C. § 3161 *et seq.*). The government submits that the time is excludable because the ends of justice served by the delay outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h).

WHEREFORE, the government respectfully requests that the Court grant its Motion for a Change of Plea Hearing and to Exclude Time. A proposed Order is attached.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: /s/ Shawn A. Weede
Shawn A. Weede
Assistant United States Attorney

Dated: January 3, 2008

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Defendant.)	

ORDER

Having considered the Government's Motion for a Change of Plea Hearing and to Exclude Time,
IT IS HEREBY ORDERED that a Change of Plea Hearing is scheduled for the ____ of _____, 2008.

IT IS FURTHER ORDERED that the period from January 3, 2008, through the ____ of _____, 2008, is excluded under the Speedy Trial Act, because the ends of justice served by the delay outweigh the best interest of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h).

The Honorable Sue L. Robinson
United States District Judge

Dated:

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CERTIFICATE OF SERVICE

I, Shawn A. Weede, Assistant United States Attorney for the District of Delaware, hereby attest under penalty of perjury that on the 3rd day of January, 2008, I had a copy of the Government's Motion For a Change of Plea Hearing and to Exclude Time sent to the following by mail:

Gordon McLaughlin, Esq.
1203 N. Orange Street
Wilmington, Delaware 19801

/s/ Shawn A. Weede
Shawn A. Weede
Assistant United States Attorney